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12/15/98

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of:

Petition for Declaratory Ruling and  
Request for Expedited Action on  
July 15, 1997 Order of the Pennsylvania  
Public Utility Commission Regarding  
Area Codes 412, 610, 215 and 717

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: NSD File No. L-97-42  
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Implementation of the Local Competition  
Provisions of the Telecommunications Act  
of 1996

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: CC Docket No. 96-98  
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**PETITION FOR RECONSIDERATION OF  
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

The Pennsylvania Public Utility Commission (PAPUC) respectfully requests that the Federal Communications Commission reconsider its September 28, 1998 Memorandum Opinion and Order and Order on Reconsideration (*Pennsylvania Order* or *Order*) in the above-captioned matter.<sup>1</sup> The PAPUC believes that the *Pennsylvania Order* does not set forth a realistic scheme to effectuate our mutual goals. The net result of the *Pennsylvania Order* is the perpetuation of costly and unnecessary area code splits.

<sup>1</sup> The *Pennsylvania Order* was published in the *Federal Register* on November 16, 1998.

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There are many fundamental points of agreement between the Commission and the PAPUC. The PAPUC supports the Commission's view that State commissions are justified in their concern about the societal costs of area code relief, that consumers are understandably frustrated about the burdens associated with area code relief, and, that all carriers should have access to numbering resources on a timely basis to be able to serve customers. The PAPUC agrees that Central Office codes (CO codes or NXX codes) are a public resource which should be used in the most efficient and effective manner possible. The PAPUC further agrees that fair and impartial access to numbering resources is a critical component of encouraging a robustly competitive telecommunications market in the United States and that state commissions have a unique understanding and familiarity with the local circumstances necessary to attaining these goals.

The PAPUC believes, however, that the nationwide uniform system of numbering administration fails to produce a reasonably efficient and effective management of the finite CO code numbering resource in a timely manner. Unmet demand for telephone numbers is not necessarily relieved "effectively and efficiently" by area code relief. The authority vested in the North American Numbering Plan Administration (NANPA or code administrator) is either inadequate (or underutilized) to address all reasonable number conservation measures to prevent or delay costly and unnecessary area code relief. The Commission should require either more aggressive conservation measures from the code administrator and/or industry or delegate to state commissions the authority to so require any and all measures prior to an area code relief decision being made. The PAPUC submits that any local consideration of national concerns, such as the

avoidance of unnecessary and costly area code splits, is not tantamount to vesting national authority in fifty-one different governments. Whatever approach the Commission sees fit to adopt, it is imperative that the Commission do more in a timely fashion to alleviate the burden on state commissions, small businesses, other consumers, and carriers, imposed by costly area code relief. The PAPUC believes that the Commission should require the Industry Numbering Committee's Central Office Code (NXX) Assignment Guidelines (Guidelines) to be strengthened or otherwise modified to achieve an equitable distribution of burdens.

**CONSERVATION METHODS MUST BE IMPOSED BEFORE A  
STATE DECIDES WHETHER A NEW AREA CODE IS NEEDED**

In Paragraph 21 of the *Pennsylvania Order*, the Commission states that its rationale for not allowing state commissions to impose number conservation measures before an area code relief decision is made is that doing so could result in "varying and inconsistent regimes" which could interfere with the routing of calls or hamper the industry's efforts at forecasting and planning for the exhaust of the North American Numbering Plan. The Commission's ultimate decision, however, will not further that objective because there is likely to be no difference in uniformity whether conservation measures are ordered before or after a final decision at the state level regarding the implementation of a new area code.

In Paragraph 24 of the *Pennsylvania Order*, the Commission delegates some authority to state commissions to order NXX code rationing. The Commission allows a state to impose number rationing plans and usage thresholds only after the state makes a final area code relief decision, i.e., after a state determines whether and when a new area code is needed and whether it

should be implemented through an overlay, geographic split or boundary change. The Commission fails to explain, however, why there is less of a problem with a lack of uniformity after an area code relief decision is made than there would be before such a decision is made. The PAPUC respectfully suggests that there will be no difference in uniformity whether conservation measures are ordered before or after a final decision at the state level regarding the implementation of a new area code. There will be, however, a huge difference in societal costs and consumer impacts if states are precluded from imposing conservation methods until after agreeing to implement a new area code, particularly if, as is likely, the new code is implemented sooner than necessary. With all due respect, the *Pennsylvania Order* perpetuates a scheme that provides too little and too late.

State commissions, as well as the industry, should work with NANPA to determine whether central office code conservation measures would, in fact, extend the longevity of an area code. State commissions are in the best position to determine whether such methods should be implemented. Specifically, state commissions are better suited than a neutral code administrator to weigh the competing interests and to render a decision. State commissions such as the PAPUC have no motivation for using numbering resources in an anti-competitive manner and are capable of reaching speedy resolutions and speedy solutions to public numbering resource issues.

The PAPUC makes the following observations about the present numbering Guidelines based on its extensive experience in Pennsylvania regarding area code relief.

Under the current industry structure of the NANPA, “applicants must certify a need”<sup>2</sup> for numbers. There is, however, no “needs based” test in the allocation of numbers. The code administrator simply meets an industry request. In this regard, the Guidelines are inadequate.

Under the Guidelines, a carrier can request one NXX, consisting of 10,000 numbers, and dispose of that NXX by allocating one number in a ten thousand-number sequence to its customers without accountability to any industry or regulatory body. In taking this action, a carrier can effectively dispose of 10,000 numbers by serving one customer. By extending that practice to 300,000 numbers, a carrier can effectively “consume” 300,000 numbers with 30 customers.

Recently in Pennsylvania, according to the code administrator, one carrier received 82 CO codes and a second carrier received 31 CO codes in the 724 area code in the Pittsburgh area after implementation of a geographic area code split. Over one million numbers were consumed by little more than two carriers without effective accountability or regulatory oversight. Originally, the 724 area code was projected to last 5.9 years. If additional carriers come into this area code and take large blocks of numbers, without a needs-based test or modification to the Guidelines, the PAPUC believes that the 724 area code will go into jeopardy well before its anticipated expiration date.

Thus, the PAPUC submits that the Guidelines fail to prevent carriers from blithely expending a scarce, public resource. Under the *Pennsylvania Order*, the PAPUC is powerless to remedy this situation nor does the code administrator have regulatory authority to recall CO

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<sup>2</sup> See Industry Numbering Committee, Central Office Code (NXX) Assignment Guidelines, INC 95-0407-008, reissued July 13, 1998, at §4.1.1.

codes that have been inappropriately or unwisely allocated to a carrier. State commissions are forced to remedy a jeopardy or shortage without the benefit of an efficient allocation process.

Number conservation in the ordinary course of allocation would prevent carriers from throwing a new area code into jeopardy by simply requesting several hundred thousand numbers. State commissions could monitor the subsequent disposition of those numbers at the local level. Code sharing can prevent a carrier from using a "consumption pattern" such as that set forth above. Rate center consolidation can reduce the number of centers that must be used to allocate NXXs in blocks of 10,000. These preventive actions, however, cannot be taken under the structure established in the *Pennsylvania Order* until the local state Commission has decided upon the form of area code relief that will be implemented i.e., a geographic split or an overlay. State commissions are powerless to monitor and remedy any carrier or industry practices that precipitate a costly and unnecessary area code split. Instead of limiting state authority to *ex post facto* actions, the Commission should reconsider the *Pennsylvania Order* and address industry practices regarding the allocation and consumption of NXXs prior to an area code split. For example, the conservation of CO codes could be addressed by modifying the Guidelines to address a more "needs-based" test for allocation of initial codes akin to the process used for allocating growth codes.

If industry and/or Pennsylvania are allowed to impose a number conservation plan, which would delay the need for a new area code until after the advent of number portability, Pennsylvania might never need a new area code, or would at least defer the need for many years. The PAPUC should have the authority to protect Pennsylvania consumers and small businesses

from the costs of an additional area code if a new code is not truly necessary and could be avoided through conservation measures. A rational allocation of numbering resources would benefit both the development of competition and consumers. Requiring the industry and/or PAPUC to move forward with the implementation of a new area code before allowing it to conserve central office codes simply does not make sense. Therefore, the Commission should reconsider that portion of the *Pennsylvania Order* that restricts state commissions from imposing number conservation methods until after a final decision is made regarding the implementation of a new area code .

The PAPUC urges the Commission to delegate to the state commissions the authority to utilize conservation measures such as code sharing, number conservation, rate center consolidation and other conservation measures *prior to and after* the implementation of area code relief at the state level. This authority is in addition to requiring industry to develop effective measures to avoid costly and unnecessary area code splits.

#### THE OPINION UNNECESSARILY LIMITS STATE DISCRETION TO ENFORCE ITS RULES AND REGULATIONS

In Paragraph 24 of the *Pennsylvania Order*, the Commission states that "state commissions do not have authority to order return of NXX codes or 1,000 number blocks to the code administrator." While it appears from the context that this statement is limited to code conservation-related orders, the language used is very broad and could be interpreted to mean that a state commission could never order the return of a code. Such a conclusion would unreasonably limit a state's ability to enforce its own rules and regulations regarding the

provision of service within its boundaries. The PAPUC would have no power to prevent carriers who wrongfully obtained or inefficiently used numbering resources from continuing to use those resources to the detriment of other properly certified and operating carriers.

The Guidelines state that a carrier must first obtain regulatory authority to serve the area for which a central office code is requested.<sup>3</sup> Carriers are allowed to self-certify to the code administrator that they have such authority.<sup>4</sup> Any improper acquisition or misuse of codes is remedied through a lengthy and convoluted process whereby matters are referred to appropriate regulatory bodies only if industry consensus is not reached.<sup>5</sup> No specific time limits are included in the Guidelines and it appears that a carrier that wrongfully obtained or used a code could continue to do so for months (at least) before the codes are actually reclaimed by the code administrator.

Reclamation of improperly obtained or used codes could have a substantial impact on code exhaust forecasts which, in turn, enable a state to make an informed decision regarding the need to implement a new area code. If the PAPUC finds that codes have been improperly obtained or used, it should have the authority to require the LEC to return the codes and it should be able to exercise that authority in an expedited fashion. The language contained in the Order, however, can be used by the LEC as a shield against such an action. Thus, the PAPUC requests that the Commission reconsider and/or clarify the language of Paragraph 24 of the *Pennsylvania Order* and specifically delegate any additional authority necessary to enable state commissions to

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<sup>3</sup> Industry Numbering Committee, Central Office Code (NXX) Assignment Guidelines, INC 95-0407-008, reissued July 13, 1998, at §4.1.3.

<sup>4</sup> *Id.* at §6.1.4.

<sup>5</sup> *See id.* at §§8, 9.5B.



reclaim codes which were obtained or used in violation of state rules, regulations, and policies. State commissions are the best position to determine whether a code holder has the necessary state authority to operate in the exchange and whether the code holder is using codes for a purpose contrary to state regulations regarding the provision of service within the state. Given the exigencies of the current circumstances regarding numbering resources, state commissions should not be held hostage by an industry-developed process which allows carriers who may well be misusing codes to continue to do so over a long period of time. Delegation of additional authority will allow states to ensure that numbering resources are available to those carriers who have a legitimate need and to support the development of competition in their state.

Some portions of the *Pennsylvania Order* should also be clarified. In Paragraph 31, the Commission encourages state commissions to submit proposed "conservation methods" to the Commission for review. Presumably, any effort of a state commission to manage numbers efficiently would constitute a conservation method. Therefore, the Commission should clarify Paragraph 31.

Finally, the issuance of the FCC Number Resource Optimization Work Group in October has had an effect on the meaning of the *Pennsylvania Order*. The reports identifies over a dozen methods of "number conservation," including, for example, rate center consolidation. Unfortunately, the group was unable to timely address these basic, simplistic conservation measures. This suggests that the industry lacks a commitment to number conservation methods. Yet, the Commission has rendered the states powerless to take up the challenge of improving the allocation process. The PAPUC does not believe that the Commission can limit state authority on

one hand, and, on the other hand expect to achieve efficient use of a scarce, public numbering resource necessary to promoting the competition envisioned by the Telecommunications Act of 1996 and various state laws. Moreover, to the extent that the *Pennsylvania Order* prohibits states from ordering number conservation measures that are not inter-state in nature, such as rate center consolidation, the Order should be reconsidered so as to not infringe on intra-state decisions that are clearly within the jurisdictions of state commissions.

#### OPTIONS

The PAPUC requests that the Commission reconsider the requirement that a state commission decide upon a specific form of area code relief before it is allowed to impose all reasonable central office code conservation measures and that it clarify the authority state commissions have to order return of central office codes that have been obtained or used in contravention of state regulations. If the Commission does not deem it proper to give states more authority, then the Commission should at least consider ordering the code administrator/industry to develop effective self-policing mechanisms in joint cooperation with the states. The PAPUC recognizes that the industry is best suited to examine their own procedures and to modify them to best serve all segments of the industry. The PAPUC believes the Commission should direct the industry to convene and produce significant modifications to its guidelines, practices and procedures post haste so state commissions do not have to become code administrators at the eleventh hour of area code relief and implementation. The industry system should include realistic business confidentiality measures, effective incentives to prevent the unauthorized

divulgence of confidential information, and an "optional appeal" to the PAPUC on any NANC-NANPA-Industry determination by a party whose business interests are unreasonably harmed by any NANC-NANPA-Industry decision. The PAPUC should be authorized to develop a procedure to quickly hear and resolve any such matter. In the event that industry is unwilling or unable to self-police, the PAPUC should be authorized to consider developing default systems, procedures and determinations when, in its judgment, the PAPUC concludes that such action is appropriate in Pennsylvania. The Commission should agree to be the final arbiter of measures developed by NANC-NANPA-Industry and it should also agree to be an arbiter of any action the PAPUC opts to take if such measures are not developed. The Commission's final authority role is indispensable to resolving area code issues in Pennsylvania and should be exercised either sua sponte or to actions taken as described in this paragraph.

Respectfully submitted,

PENNSYLVANIA PUBLIC UTILITY  
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Dated: December 15 , 1998

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**CERTIFICATE OF SERVICE**

I, Maryanne Reynolds Martin, hereby certify that I have on this 15th day of December, 1998, served an original and fourteen true and correct copies of the Petition for Reconsideration of the Pennsylvania Public Utility Commission upon the Secretary of the Federal Communications Commission by Federal Express and that I have served a true and correct copy of the Petition upon the other persons listed below by first class mail:



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